

XX DAYS @ \$X.XXX/DAY

ACCOUNT_FEE

ADDER CHARGE

ADJUSTMENT

ADJUSTMENTS

ADMIN CHARGE

ADMIN CHARGE

ADMIN CHARGE

ADMIN CHARGE

ADMIN CHARGE

ADMIN CHARGE

ADMIN CHARGE

ADMIN CHARGE

ADMIN CHARGE

ADMIN CHARGE

ADMIN CHARGE

Ancillary Cost

Ancillary Svcs

Ancillary:

Balancing Energy

BALANCING TRANS. CONGESTION

Basic Customer Charge

BILLING ADJUSTMENT

Budget Adjustments

BUDGET AMOUNT

BUDGET BILL RECONCILIATION

Budget for Commodity Charge

Budget Installment

Budget True Up

Budget TrueUp

CAPACITY (0 OBL X 14 DAYS)

CAPACITY (0 OBL X 17 DAYS)

Capacity Adjustment

CAPACITY CHARGE

Capacity Cost

Capacity PLC

CHANGE IN CAPACITY COST

Contract Charges

Contract Re-Rate Credit

CUSTOMER CHARGE

CUSTOMER CHARGE (29 DAYS)

CUSTOMER CHARGE (30 DAYS)

CUSTOMER CHARGE (31 DAYS)

CUSTOMER CHARGE (32 DAYS)

CUSTOMER CHARGE (34 DAYS)

Early Termination Fee

ENERGY CHARGE: 0.00 [REDACTED]
ENERGY CHARGE: 0.00 [REDACTED]
Flat Bill
Flat Monthly Price of
FLAT RATE ENERGY PROGRAM
[REDACTED] GREEN
LATE PAYMENT CHARGES
Losses Cost
LRG CX USAGE CHRG (29 DAYS)
[REDACTED] RENEWABLE ENERGY PURCHASE
Market Charges
Misc. Adjustment
MONTHLY CHARGE
Monthly Charge @ XX.XX
Monthly Service Fee
Net Metering
Net Metering Credits
PASS THROUGH CAPACITY CHARGE
Past Due Interest
PJM BALANCING CONGESTION
PJM BCC
Pool Participation
Real Time Settlement
Renewable Cost
RENEWABLE ENERGY
RenewCompChrg:
Retail Adder
RTEP SETTLEMENT ADJUSTMENT
RTEP SETTLEMENT NON-CIL
RTO Adjustment:
Transaction Line Losses
Unforced Capacity
UNFORCED CAPACITY CHARGES

Sum of CHARGE_OFF_AMT	Column Labels		
Row Labels	NON-SHOPPING	SHOPPING	Grand Total
Lighting	\$ (13,051.44)		\$ (13,051.44)
Primary	\$ (180.93)		\$ (180.93)
Residential	\$ (2,831,225.62)		\$ (2,831,225.62)
Secondary	\$ (233,097.63)		\$ (233,097.63)
Shopping		\$ (1,269,345.60)	\$ (1,269,345.60)
Sub/Tran	\$ (141,658.91)		\$ (141,658.91)
Grand Total	-\$3,219,214.53	-\$1,269,345.60	-\$4,488,560.13

Sum of CHARGE_OFF_AMT	Column Labels		
Row Labels	NON-SHOPPING	SHOPPING	Grand Total
Lighting	\$ (22,210.38)		\$ (22,210.38)
Residential	\$ (3,835,963.89)		\$ (3,835,963.89)
Secondary	\$ (274,399.75)		\$ (274,399.75)
Shopping		\$ (1,066,993.73)	\$ (1,066,993.73)
Grand Total	\$ (4,132,574.02)	\$ (1,066,993.73)	\$ (5,199,567.75)

				Weighted Average of Non-Shopping
Total AEP Ohio	Non-Shopping	Shopping	Grand Total	
Lighting	\$ (35,261.82)		\$ (35,261.82)	0.3640%
Primary	\$ (180.93)		\$ (180.93)	0.0019%
Residential	\$ (6,667,189.51)		\$ (6,667,189.51)	68.8181%
Secondary	\$ (507,497.38)		\$ (507,497.38)	5.2383%
Shopping		\$ (2,336,339.33)	\$ (2,336,339.33)	24.1155%
Sub/Tran	\$ (141,658.91)		\$ (141,658.91)	1.4622%
Grand Total	\$ (7,351,788.55)	\$ (2,336,339.33)	\$ (9,688,127.88)	

From AEP Ohio COVID-19

Percentage of SSO portion of Sales of ELE	
Lighting	19.60%
Primary	51.84%
Residential	39.65%
Secondary	42.65%
Sub/Tran	57.25%

Total Bad Debt Deferral	4,650,673.46
Total AR Exp Deferral	(2,743,803.73)
Total Factoring Deferral	1,906,869.73

Allocation of Bad Debt Deferral			
Customer Type	Total Bad Debt	SSO	Other

Lighting	16,927.03	3,317.58	13,609.45	
Primary	86.85	45.02	41.83	
Residential	3,200,507.02	1,269,134.45	1,931,372.57	
Secondary	243,618.23	103,896.55	139,721.69	
Sub/Tran	68,001.72	38,932.68	29,069.03	
Shopping	1,121,532.61		1,121,532.61	
	4,650,673.46	1,415,326.28	3,235,347.18	30.43%

**OHIO POWER COMPANY'S RESPONSE TO
INTERSTATE GAS SUPPLY, INC.'S
DISCOVERY REQUEST
PUCO CASE 20-585-EL-AIR
FOURTH SET**

INTERROGATORY

IGS-INT-04-009

Regarding the document attached labeled Attachment B:

- a. Please identify the costs associated with creating, printing, and disseminating Attachment B including labor.
- b. Please identify whether salaries related to individuals that developed the document included in Attachment B are reflected in the test year expense.
- c. Please identify the recovery mechanism(s) for costs identified in response to (a).
- d. Are any costs associated with creating, printing, and disseminating Attachment B included in the test year?
- e. Please identify the AEP Ohio customers that received a copy of Attachment B.
- f. How were the customers identified in (e) determined?
- g. In identifying the customers in (e), what information and/or data regarding the customer did AEP Ohio consider (i.e. rate class, annual usage, hourly usage, demand, etc.)?
- h. Please identify how AEP Ohio obtained addresses and personal information regarding any individuals identified in response to (e).
- i. Please identify the approximate date range that AEP Ohio provided Attachment B to customers.

RESPONSE

- a. The Company did not separately identify the costs associated with the internal development of Attachment B.
- b. This type of cost would be included to the extent these employees billed their time to work orders that are funded by AEP Ohio during the test year. However, the letter was developed and intended for use prior to the beginning of the test year (September-October 2019), therefore, employee salaries related to the development of Attachment B are not included in the test year expense.
- c. This type of cost is not encompassed by any rider and is generally reflected in base rates.
- d. See the response to IGS-INT-04-009.b.
- e. The Company objects to this request as seeking information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving the foregoing objection(s) or any general objection the Company may have, the Company states as follows. The Company's customer account representatives provided Attachment B to AEP Ohio commercial and industrial customers with whom we have familiarity of their service needs as part of our customer account relationships.

**OHIO POWER COMPANY'S RESPONSE TO
INTERSTATE GAS SUPPLY, INC.'S
DISCOVERY REQUEST
PUCO CASE 20-585-EL-AIR
FOURTH SET**

- f. See the response to IGS-INT-04-009.e.
- g. See the response to IGS-INT-04-009.e.
- h. See the response to IGS-INT-04-009.e.
- i. See the response to IGS-INT-04-009.b.

Prepared by:

Counsel

Jon F. Williams

Andrea E. Moore



An AEP Company

BOUNDLESS ENERGY™

AEP Ohio
700 Morrison Road
Gahanna, OH 43230

AEP Ohio would like to offer you a unique opportunity to acquire long term renewable green energy from two utility scale solar projects we are developing in Ohio at competitive pricing. If you expect market power prices to increase over the next 10 to 20 years like we do, this offer could lower your overall cost of energy, provide electricity price certainty all while helping meet your green energy and sustainability goals.

AEP Ohio's offer is based on its exclusive access to two utility scale solar projects to be built in Highland county. Both projects are located in Ohio's Appalachian region, an area of economic need in the state. The Willowbrook project is 100 MW and the Highland project is 300 MW, for a total of 400 MW of capacity available through AEP Ohio. The 20 year projects are currently projected to be completed and available by December 2021 with the expected contract start date January 2022.

We will offer discounted pricing based on term length and early adoption. All contracts are subject to approval by the Public Utilities Commission of Ohio.

This offer is available first come, first serve for a short time (September – October) only so I encourage you to request a meeting now through your AEP Ohio account manager to discuss the details of this opportunity with your company's energy supply and sustainability decision makers. We will provide more detail at the meeting.

A Non-Disclosure Agreement is attached and will need to be signed to share detailed pricing information. Please execute this agreement prior to your scheduled appointment.

Finally, I would encourage you to share this exciting opportunity with your senior executive team. Pursuing this opportunity will help your company support Ohio based renewable energy, achieve your sustainability goals for energy, lower your overall energy cost and provide price stability for the long term.

Sincerely,

Raja Sundararajan
President & COO – AEP Ohio

**OHIO POWER COMPANY'S RESPONSE TO
INTERSTATE GAS SUPPLY, INC.'S
DISCOVERY REQUEST
PUCO CASE 20-585-EL-AIR
FOURTH SET**

INTERROGATORY

- IGS-INT-04-010 Regarding the document attached to this discovery labeled Attachment B:
- a. Is the labor associated with the "AEP Ohio account manager" or managers referenced in the fourth paragraph of Attachment B included in the test year?
 - b. What FERC Account does AEP Ohio record the costs related to "AEP Ohio account manager(s)"?
 - c. Identify all costs related to "AEP Ohio account managers" proposed for recovery in this case.
 - d. Please identify any other employees that participated in any meeting(s) requested by customers in response to the Attachment B.
 - e. For each employee in (d), please identify whether their salaries are included in the test year.

RESPONSE

- a. Labor costs for AEP Ohio account managers are included in the test year labor costs.
- b. Generally, AEP Ohio records the costs related to AEP Ohio account managers in the following FERC accounts:
 - 1070000 Construction Work In Progress
 - 1070001 CWIP - Project
 - 5880000 Miscellaneous Distribution Exp
 - 9030001 Customer Orders & Inquiries
 - 9070000 Supervision - Customer Service
 - 9080000 Customer Assistance Expenses
 - 9080009 Cust Assistance Expense - DSM
 - 9100000 Misc Cust Svc&Informational Ex
 - 9110002 Supervision - Comm & Ind
 - 9200000 Administrative & Gen Salaries
 - 9302007 Assoc Business Development Exp
- c. The Company does not budget labor, incentives or other costs on an employee ID level but rather a department level. The data as requested is not available for the budgeted test year. The actual labor for December 2019 for the customer account managers is 172,458. Actual incentive accrual for individual employees is not available by employee ID.
- d.-e. The Company objects to this request as seeking information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving the foregoing objection(s) or any general objection the Company may have, the Company states as follows. The meetings were attended by a number of AEP Ohio and AEP Service Corporation employees and these labor expenses would be included to the extent these employees billed their time to work orders that are funded by AEP Ohio during the test year.

**OHIO POWER COMPANY'S RESPONSE TO
INTERSTATE GAS SUPPLY, INC.'S
DISCOVERY REQUEST
PUCO CASE 20-585-EL-AIR
FOURTH SET**

Prepared by:

Jon F. Williams

Andrea E. Moore

**OHIO POWER COMPANY'S RESPONSE TO
THE PUBLIC UTILITIES COMMISSION OF OHIO'S
DATA REQUEST
PUCO CASE 20-585-EL-AIR
FORTY-FIFTH SET (DR#107-109)**

DATA REQUEST

- PUCO-DR-45-109 A. Does the Company track customer complaints? If so, does the Company identify the type of complaint by an identifier or code? If so, please provide those identifiers or codes.
- B. How does the Company identify a customer complaint?
- C. Please provide number of customer complaints (Better Business Bureau and PUCO) received in 2018, 2019, and through June of 2020 for electric choice.
- D. Does the current CIS include a grievance (complaint) process or similar method to track individual concerns? If so, please in detail provide the process.

RESPONSE

A. Yes. We do not use a numeric coding system, but rather we differentiate complaints by using Product Types, Categories, and Causes.

B. Complaints that are tracked are those that were received through the Ohio Commission or other state agencies, such as BBB, Attorney General, or written complaints from customers. Within the new CRM tracking tool, we enter & track the following types of complaints:

1. All Commission Complaints & Inquiries (Formal & Informal)
2. All Better Business Bureau (BBB) Complaints
3. All Executive and Escalated Complaints received via email, US Postal Service, fax, or voice mail.
4. All Attorney General Complaints
5. All Legislative Complaints (KY) which can be recorded as Inquiries rather than complaints
6. All Enforcement Notifications from the Commission (PSO)

What should NOT be entered in the tool is customers who call in with general complaints to the call center.

The criteria for the types of complaints that are tracked within the tool is mainly based on two things: how the complaint was received and what agency sent it. Customers who call the Contact Centers or other complaints made by individuals to the Contact Center will not be tracked within the tool, but instead recorded in the notes associated with the caller/customers account. This ensured that their feedback is still captured as it is important to the 360 view. However, only complaints received through the identified channels will be tracked in the CRM Complaint Tracking Tool.

C. 2018 = 144, 2019 = 244, 1/1/2020-6/30/2020 = 104

D. Yes. Complaint Process Overview:

- Receive Complaint: Complaints are received from PUCO, the customer, or other state agencies through inbound channels (email, letters, web, social media).

**OHIO POWER COMPANY'S RESPONSE TO
THE PUBLIC UTILITIES COMMISSION OF OHIO'S
DATA REQUEST
PUCO CASE 20-585-EL-AIR
FORTY-FIFTH SET (DR#107-109)**

- Record Complaint: Commission Liaison (CL) records details of the complaint in CRM and routes the complaint to the proper group to research.
- Resolve Complaint: Complaint is reviewed by the group(s) designated to research and resolve the complaint, including any contact needed to the customer.
- Respond: Upon completion of the investigation, the CL drafts a formal response to the PUCO.

Prepared by:

Andrea E. Moore

**OHIO POWER COMPANY'S RESPONSE TO
INTERSTATE GAS SUPPLY'S
DISCOVERY REQUEST
PUCO CASE 20-585-EL-AIR
SIXTH SET**

INTERROGATORY

IGS-INT-06-003 R.C. 4928.47(B) states: "Any direct or indirect costs, including costs for infrastructure development or generation, associated with the in-state customer-sited renewable energy resource shall be paid for solely by the utility and the mercantile customer or group of mercantile customers. At no point shall the commission authorize the utility to collect, nor shall the utility ever collect, any of those costs from any customer other than the mercantile customer or group of mercantile customers." How has AEP Ohio ensured that no direct or indirect costs associated with the customer sited renewable energy resource(s) have been included in the test year expense that is sought for recovery through distribution rates in this proceeding?

RESPONSE

If the Company has a project a separate work order would be created to track all costs associated with the project. The costs would be tracked and recovered as part of the agreement between the Company and mercantile customer(s).

Prepared by:

Jon F. Williams

**OHIO POWER COMPANY'S RESPONSE TO
INTERSTATE GAS SUPPLY'S
DISCOVERY REQUEST
PUCO CASE 20-585-EL-AIR
SIXTH SET**

INTERROGATORY

IGS-INT-06-004 Regarding customer sited renewable energy resources that may be constructed under R.C. 4928.47:

- a. Has AEP Ohio solicited any customers for this purpose?
- b. If the answer to (a) is yes, identify how AEP Ohio determined which customers to solicit.
- c. If the answer to (a) is yes, how did AEP Ohio track the direct and indirect costs associated with these solicitations?
- d. If the answer to (a) is yes, how were such costs removed from the test year?

RESPONSE

a.-d. The Company objects to this request as seeking information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving the foregoing objection(s) or any general objection the Company may have, the Company states as follows. The Company has had preliminary conversations with interested customers in the context of traditional customer service about providing potential renewable solutions to meet their needs. Any costs associated with such conversations are incidental to the utility's customer service function and do not constitute project costs. See the Company's response to IGS-INT-06-003 for project cost tracking information.

Prepared by:

Jon F. Williams

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

5/21/2021 11:59:44 AM

in

Case No(s). 20-0585-EL-AIR, 20-0586-EL-ATA, 20-0587-EL-AAM

Summary: Exhibit IGS Exhibits 6-10, 15, 18, 19 electronically filed by Mr. Ken Spencer on behalf of Armstrong & Okey, Inc.